

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON FEBRUARY 11, 2025 AT 2:00 P.M. (EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures (<https://www.deb.uscourts.gov/content/judge-craig-t-goldblatt>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

ADJOURNED MATTER

1. Motion of Debtors for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 15]

Related Documents:

- (a) Notice of Motion of Debtors for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 138]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Responses Received:

- (a) United States Trustee's Omnibus Objection to: (1) Motion of Debtors for Entry of an Order, Inter Alia, Approving Bidding Procedures and Scheduling Certain Dates and Deadlines With Respect Thereto; (2) Motion of Debtors for Entry of Interim and Final Orders, Inter Alia, Authorizing the Debtors to Use Cash Collateral; and (3) Motion of Debtors for Entry of an Order, Inter Alia, Extending Time to File Certain Bankruptcy Schedules and Statements (Filed February 5, 2025) [Docket No. 285]

Status: This matter is adjourned to the hearing on March 6, 2025. This matter will not be going forward.

CERTIFICATES OF NO OBJECTION/CERTIFICATIONS OF COUNSEL

- 2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Serve Certain Parties in Interest By Email, (B) Approve the Form and Manner of Service of the Notice of Commencement, (C) Redact or Withhold Certain Confidential Information of Customers, and (D) Redact Certain Personally Identifiable Information of Individuals, and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 4]

Related Documents:

- (a) Interim Order (I) Authorizing the Debtors to (A) Serve Certain Parties in Interest by Email, (B) Approve the Form and Manner of Service of the Notice of Commencement, (C) Redact or Withhold Certain Confidential Information of Customers, and (D) Redact Certain Personally Identifiable Information of Individuals, and (II) Granting Related Relief (Entered January 17, 2025) [Docket No. 114]
- (b) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Serve Certain Parties in Interest By Email, (B) Approve the Form and Manner of Service of the Notice of Commencement, (C) Redact or Withhold Certain Confidential Information of Customers, and (D) Redact Certain Personally Identifiable Information of Individuals, and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 128]
- (c) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Serve Certain Parties in Interest By Email, (B) Approve the Form and Manner of Service of the Notice of Commencement, (C) Redact or Withhold Certain Confidential Information of Customers, and (D) Redact Certain Personally Identifiable Information of Individuals, and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 318]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, and (ii) the Office of the U.S. Trustee.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

3. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 7]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief (Filed January 16, 2025) [Docket No. 81]
- (b) Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief (Entered January 16, 2025) [Docket No. 105]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 130]
- (d) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 321]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, (ii) the Office of the U.S. Trustee, (iii) the Prepetition FILO Agent, and (iv) the Prepetition ABL Agent.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

4. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Store Support Vendors, (B) Lien Claimants, and (C) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Filed January 15, 2025) [Docket No. 8]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Store Support Vendors, (B) Lien Claimants, and (C) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Filed January 16, 2025) [Docket No. 82]
- (b) Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Store Support Vendors, (B) Lien Claimants, and (C) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Entered January 17, 2025) [Docket No. 109]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Store Support Vendors, (B) Lien Claimants, and (C) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Filed January 17, 2025) [Docket No. 131]
- (d) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Store Support Vendors, (B) Lien Claimants, and (C) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief (Filed February 7, 2025) [Docket No. 310]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, (ii) the Office of the U.S. Trustee, (iii) the Prepetition FILO Agent, and (iv) the Prepetition ABL Agent.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

5. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain and Administer Their Customer Programs and (B) Honor Prepetition Obligations and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 9]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Debtors to (A) Maintain and Administer Their Customer Programs and (B) Honor Prepetition Obligations and (II) Granting Related Relief (Filed January 16, 2025) [Docket No. 83]
- (b) Interim Order (I) Authorizing the Debtors to (A) Maintain and Administer Their Customer Programs and (B) Honor Prepetition Obligations and (II) Granting Related Relief (Entered January 17, 2025) [Docket No. 107]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain and Administer Their Customer Programs and (B) Honor Prepetition Obligations and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 132]
- (d) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain and Administer Their Customer Programs and (B) Honor Prepetition Obligations and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 311]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, (ii) the Prepetition FILO Agent, and (iii) the Prepetition ABL Agent.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

6. Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 10]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief (Filed January 16, 2025) [Docket No. 84]

- (b) Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief (Entered January 17, 2025) [Docket No. 110]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 133]
- (d) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 314]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from the Official Committee of Unsecured Creditors.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 11]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (Filed January 16, 2025) [Docket No. 85]
- (b) Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (Entered January 16, 2025) [Docket No. 104]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing

the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 134]

- (d) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 315]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) PayPal Holdings, Inc. (ii) IG Design Group Americas, Inc., (iii) Fiserv (iii) the Prepetition ABL Agent, (iv) the Prepetition FILO Agent, (v) the Official Committee of Unsecured Creditors, and (vi) the Office of the U.S. Trustee.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

- 8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 12]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief (Filed January 16, 2025) [Docket No. 86]
- (b) Interim Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief (Entered January 17, 2025) [Docket No. 111]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 135]
- (d) Certificate of No Objection Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 316]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Committee.

Responses Received: None.

Status: A Certificate of No Objection was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

9. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, and (C) Continue to Pay Broker Fees, and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 13]

Related Documents:

- (a) Interim Order (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, and (C) Continue to Pay Broker Fees, and (II) Granting Related Relief (Entered January 17, 2025) [Docket No. 125]
- (b) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, and (C) Continue to Pay Broker Fees, and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 136]
- (c) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance, Surety Coverage, and Letters of Credit Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, and (C) Continue to Pay Broker Fees, and (II) Granting Related Relief (Filed February 7, 2025) [Docket No. 320]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, (ii) the Prepetition FILO Agent, (iii) the Prepetition ABL Agent, and (iv) Liberty Mutual Insurance.

Status: A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.

MATTERS GOING FORWARD

10. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed January 15, 2025) [Docket No. 6]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed January 16, 2025) [Docket No. 88]
- (b) Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Entered January 16, 2025) [Docket No. 106]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed January 17, 2025) [Docket No. 129]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended to February 5, 2025 for the *ad valorem* taxing authorities in Texas, and until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors and for Witte Plaza, Ltd.

Responses Received: Informal comment by Witte Plaza, Ltd.

- (a) United States Trustee's Omnibus Objection to: (1) Motion of Debtors for Entry of an Order, Inter Alia, Approving Bidding Procedures and Scheduling Certain Dates and Deadlines With Respect Thereto; (2) Motion of Debtors for Entry of Interim and Final Orders, Inter Alia, Authorizing the Debtors to Use Cash Collateral; and (3) Motion of Debtors for Entry of an Order, Inter Alia, Extending Time to File Certain Bankruptcy Schedules and Statements (Filed February 5, 2025) [Docket No. 285]

- (b) [SEALED] Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 299]
- (c) [SEALED] Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 300]
- (d) [SEALED] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 6, 2025) [Docket No. 303]
- (e) Wilmington Savings Fund Society, FSB's Joinder to Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to The Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 305]
- (f) Limited Objection of ARC CLORLFL001, LLC; ARC NLLKLFL001, LLC; ARC SMWMBFL001, LLC; ARG JAFPTIL001, LLC; ARG MHMORNC001, LLC; ARG OTOWEKY001, LLC; ACADIA REALTY LIMITED PARTNERSHIP; AMERICAN FORK SC, LLC; BMA JC LLC; BRIXMOR OPERATING PARTNERSHIP LP; CCA-RSSC LLC; EDENS; FEDERAL REALTY OP LP; GALLATIN MALL GROUP, L.L.C.; HUTENSKY CAPITAL PARTNERS, LLC; LA COSTA CAPITAL PARTNERS; LANCASTER DEVELOPMENT COMPANY LLC; MARKETPLACE WEST PARTNERS, LLC; OREM FAMILY CENTER, LLC; PBA II, LLC; PRIDE CENTER CO., LLC; RD MANAGEMENT, LLC; RENAISSANCE PARTNERS I, LLC; SANTA SUSANA GRF2, LLC; SHERMAN COMMONS, L.P., SHOPPING CENTER ASSOCIATES, LP; TPP 217 TAYLORSVILLE, LLC; THE STERLING ORGANIZATION; UFPTFC, LLC & BBTFCLLC; AND, WESTFORD VALLEY MARKETPLACE, Inc. to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed February 7, 2025) [Docket No. 308]
- (g) Objection to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, Etc. (Filed February 7, 2025) [Docket No. 309]
- (h) Joinder to Preliminary Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 323]

Status: This matter will be going forward.

11. Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 15, 2025) [Docket No. 14]

Related Documents:

- (a) Interim Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Entered January 17, 2025) [Docket No. 113]
- (b) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 17, 2025) [Docket No. 137]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Committee.

Responses Received: Informal comment by (i) Waste Management and various affiliates and/or subsidiaries, (ii) Granite Telecommunications, LLC and (iii) the Office of the U.S. Trustee.

- (a) Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 31, 2025) [Docket No. 225]
- (b) Joinder of Certain Utility Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility

Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 31, 2025) [Docket No. 226]

- (c) Joinder of Certain FirstEnergy Operating Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 31, 2025) [Docket No. 227]

Status: This matter will be going forward.

- 12. Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 16]

Related Documents:

- (a) Notice of Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 139]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Committee.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, (ii) the Office of the U.S. Trustee, (iii) Edison & Company, (iv) WPH Legacy, LLC, (v) Clark Hill, (vi) Village West and Lynwood Center, (vii) landlords represented by Barclay Damon LLP, (viii) landlords represented by Ballard Spahr LLP, and (ix) landlords represented by Allen Matkins Leck Gamble Mallory & Natsis LLP.

- (a) Limited Omnibus Objection of IG Design Group Americas, Inc. to Sale Procedures Motion and Contract Procedures Motion (Filed February 4, 2025) [Docket No. 258]

Status: This matter will be going forward.

13. Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed January 15, 2025) [Docket No. 17]

Related Documents:

- (a) Notice of Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed January 17, 2025) [Docket No. 140]
- (b) Notice of Potential Sale Hearing (Filed January 24, 2025) [Docket No. 182]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments by (i) landlords of Village West and Lynnwood Center, and (ii) Witte Plaza, Ltd.

- (a) Crafty (AL) LLC's Limited Objections to Debtors' Motion for Entry of an Order, Inter Alia: (I) Approving Stalking Horse Agreement; (II) Authorizing Assumption and Assignment of Assumed Contracts and Leases; and (III) Approving Sale of Assets (Filed February 4, 2025) [Docket No. 257]
- (b) Limited Omnibus Objection of IG Design Group Americas, Inc. to Sale Procedures Motion and Contract Procedures Motion (Filed February 4, 2025) [Docket No. 258]
- (c) [Sealed] Exhibit A to (I) Limited Omnibus Objection to Sale Procedures Motion and Contract Procedures Motion and (II) Motion (A) to Compel the Debtors to Assume or Reject Executory Contract, and (B) to Modify the Automatic Stay (Filed February 4, 2025) [Docket No. 261]
- (d) United States Trustee's Omnibus Objection to: (1) Motion of Debtors for Entry of an Order, Inter Alia, Approving Bidding Procedures and Scheduling Certain Dates and Deadlines With Respect Thereto; (2) Motion of Debtors for Entry of Interim and Final Orders, Inter Alia, Authorizing the Debtors to Use Cash Collateral; and (3) Motion of Debtors for Entry of an Order, Inter Alia, Extending Time to File Certain

Bankruptcy Schedules and Statements (Filed February 5, 2025)
[Docket No. 285]

- (e) [SEALED] Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 299]
- (f) [SEALED] Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 300]
- (g) [SEALED] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 6, 2025) [Docket No. 303]
- (h) Wilmington Savings Fund Society, FSB's Joinder to Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 305]
- (i) Objection of ARC CLORLFL001, LLC; ARC NLLKLFL001, LLC; ARC SMWMBFL001, LLC; ARG JAFPTIL001, LLC; ARG MHMORNC001, LLC; ARG OTOWEKY001, LLC; Acadia Realty Limited Partnership; American Fork SC, LLC; BMA JC LLC; Brixmor Operating Partnership LP; CCA-RSSC LLC; EDENS; Federal Realty OP LP; Gallatin Mall Group, L.L.C.; Hutensky Capital Partners, LLC; La Costa Capital Partners; Lancaster Development Company LLC; Marketplace West Partners, LLC; Orem Family Center, LLC; PBA II, LLC; Pride Center Co., LLC; RD Management, LLC; Renaissance Partners I, LLC; Santa Susana GRF2, LLC; Sherman Commons, L.P., Shopping Center Associates, LP; TPP 217 Taylorsville, LLC; The Sterling Organization; UFPTFC, LLC & BBTFCLLC; and, Westford Valley Marketplace, Inc. to Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed February 7, 2025) [Docket No. 317]
- (j) Limited Objection of GC Ambassador Courtyard LLC, MP Elko, LLC, and MGP XII Sunrise Village, LLC to Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the

Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed February 7, 2025) [Docket No. 319]

- (k) [Lion Brand] Joinder to Preliminary Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 323]

Status: This matter will be going forward.

- 14. Motion of Debtors for Entry of an Order (I) Extending the Deadline for the Debtors to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief (Filed January 21, 2025) [Docket No. 157]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Committee.

Responses Received:

- (a) The South Plaza Landlord's Objection to the Debtors' 365(d)(4) Motion (Filed February 4, 2025) [Docket No. 260]

Status: This matter will be going forward.

- 15. Motion of IG Design Group Americas, Inc. to File "Exhibit A" to Limited Objection Under Seal (Filed February 4, 2025) [Docket No. 264]

Related Documents:

- (a) [SEALED] Exhibit A to (I) Limited Omnibus Objection to Sale Procedures Motion and Contract Procedures Motion and (II) Motion (A) to Compel the Debtors to Assume or Reject Executory Contract, and (B) to Modify the Automatic Stay (Filed February 4, 2025) [Docket No. 261]
- (b) IG Design Group Americas, Inc.'s Witness and Exhibit List for Hearing Scheduled for February 11, 2025, at 2:00 p.m. (Eastern Time) (Filed February 7, 2025) [Docket No. 304]

Objection Deadline: February 11, 2025 at 2:00 p.m. (ET).

Responses Received: None at this time.

Status: This matter will be going forward.

Dated: February 7, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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